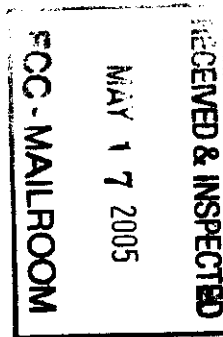




CALIFORNIA
TELEPHONE
ASSOCIATION



May 12, 2005

Ms. Marlene Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington, DC 20554

Re: WC 03-109, In the Matter of Lifeline and Link-Up – Request of the California Public Utilities Commission and the People of the State of California for an Extension of Time.

Dear Ms. Dortch:

The California Telephone Association (“CTA”) is a statewide trade association comprised of all incumbent local exchange carriers providing telecommunications services within California and over 200 providers of products and services to the industry. CTA submits this letter in support of the California Public Utilities Commission’s (“CPUC”) request for time to comply with the Federal Communications Commission (“FCC”) Report and Order 04-87 (“Report 04-87”).

On April 7, 2005, the CPUC issued a decision restructuring the administration of Universal Lifeline Telephone Service (“ULTS”) to comply with the directives set forth in Report 04-87. In addition to altering ULTS’ certification and verification processes, the CPUC ordered the appointment of a third party administrator to administer all eligibility procedures through enhanced mechanized and web-based systems. The result will be a well-developed and effective program to further ensure that only eligible consumers receive benefits under the Lifeline-Link Up program.

However, the sweeping changes mandated in the CPUC’s decision cannot be completed by the present deadline of June 22, 2005. The CPUC will need at least six to eight additional months to restructure the program and commence the administration of ULTS’ new certification and verification process as anticipated in Report 04-87. If the FCC does not agree to extend its compliance deadline, over 3.5 million Lifeline-Link Up participants will lose vital federal assistance during ULTS’ transition period.

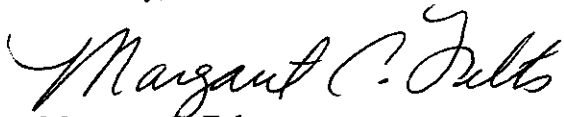
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Ms. Marlene Dortch
May 12, 2005
Page Two

CTA urges the FCC to grant the request for an extension of time in order to avoid prejudicing California's Lifeline-Link Up participants while the CPUC restructures ULTS in compliance with Report 04-87.

Thank you for your consideration of CTA's letter of support.

Sincerely,

A handwritten signature in cursive script, reading "Margaret C. Felts".

Margaret C. Felts
President, California Telephone Association

MCF/ml